

REMARKS

Claims 1-34 are pending in this application. By this Amendment, claims 1, 31 and 32 are amended.

The courtesies extended to Applicant's representative by Examiner Nguyen at the interview held April 6, 2005, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicant's record of the interview.

During the personal interview, Applicant's representative traversed the rejection of claims 1, 6, 21 and 26-32 under 35 U.S.C. §103(a) over Kida et al. (Kida), U.S. Patent No. 6,335,728 in view of Shimamoto, U.S. Patent No. 6,147,672.

Based on the personal interview, Applicant amends claim 1 to clarify that the external MPU is a microprocessor unit (MPU) that is external to the RAM-incorporated driver. As argued during the personal interview, Fig. 7 of Kida discloses a driving apparatus that includes an A/D converter 31, a control circuit 32, an image data processing circuit 33, field memories 34A, 34B and switches SW31, SW32 (col. 10, lines 12-35). The switches SW31, SW32 fail to receive data from an MPU that is external to the driving apparatus or a RAM-incorporated driver because the image data processing circuit 33 is a feature included internally within the driving apparatus.

Kida does not identify any of the features of the driving apparatus illustrated by Fig. 7 as being part of a RAM-incorporated driver or an MPU that is external to the RAM-incorporated driver. Hindsight reconstruction exists in order to separate the various features of Kida's driving apparatus into an MPU or a RAM-incorporated driver.

Accordingly, Kida fails to disclose a RAM-incorporated driver with a first port through which the still-image data or a given command is input from a microprocessor unit (MPU) that is external to the RAM-incorporated driver and a second port through which the

moving-image data, which is transferred serially over a serial transfer line from the MPU that is external to the RAM-incorporated driver, is input as a differential signal, as recited in claim 1.

As argued during the personal interview, Kida also fails to disclose or suggest a RAM-incorporated driver with a second port that is independent from a first port, as recited in claims 27 and 28.

Examiner Nguyen argued that contact a of switch SW32 and contact b of switch 32 correspond to the first and second ports of claims 27 and 28. However, the contacts a, b are not independent from each other. The contacts a, b are not independent because data cannot be input through the contact b while data is being input through the contact a, as shown in Kida's Fig. 7. Conversely, data cannot be input through the contact a while data is being input through the contact b. Contact b (i.e., the second port) cannot be independent from contact a (i.e., the first port) because the ability to transfer data through contact b depends on whether data is being transferred through contact a. Accordingly, Kida fails to disclose or suggest a RAM-incorporated driver with a second port that is independent from a first port, as recited in claims 27 and 28.

As also argued during the personal interview, Kida fails to disclose a RAM-incorporated driver with a RAM which stores the still image data that was input through the first port and the moving-image data that was created by the reception circuit (the reception circuit differentially amplifying the differential signal input from the second port), or a first control circuit and a second control circuit that operate using the RAM, as recited in claims 1, 27 and 28.

As discussed above, Examiner Nguyen argued that contact a corresponds to the first port and contact b corresponds to the second port. With such an interpretation, the field memory 34A only stores data that was input through a first port (i.e., contact a) and the field

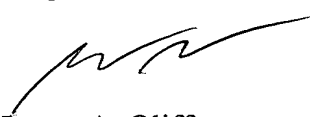
memory 34B only stores data that was input through a second port (i.e., contact b). As such, neither field memory 34A, 34B stores data that was input through the first port and data created by a reception circuit (which receives data input from the second port). Kida's structure is thus complicated because an additional switch SW33 is used to read data from the field memories 34A, 34B. Accordingly, Kida fails to disclose or suggest the RAM, as recited in claims 1, 27 and 28.

Shimamoto fails to overcome the deficiencies of Kida in disclosing or suggesting all of the features recited claims 1, 27 and 28.

In view of the foregoing, Applicant's representative argued that the rejection of claims 1, 6, 21 and 26-32 under 35 U.S.C. §103(a) over Kida in view of Shimamoto should be withdrawn.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff
Registration No. 27,075

Scott M. Schulte
Registration No. 44,325

JAO:SMS/sxb

Date: April 26, 2005
OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--